



DEPARTMENT OF INFORMATION RESOURCES

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October 9, 1996

William F. Caton, Acting Secretary
Federal Communications Commission
Office of the Secretary
1919 M Street, N.W.
Washington, D.C. 20554

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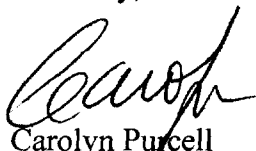
Re: CC Docket No. 92-105

Dear Mr. Caton:

Enclosed for filing is an original and four copies of the Texas Department of Information Resources comments on the request by the Department of Justice for the assignment of the N11 number, 311 for non-emergency communications.

Please acknowledge receipt of this document by date-stamping the duplicate copy of this letter and returning it in the enclosed self-addressed, stamped envelope.

Sincerely,


Carolyn Purcell
Executive Director

CP:ES:JJ:nr

Enclosures

cc: ITS, Inc.

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**BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION**

IN THE MATTER OF

**USE OF N11 CODES AND OTHER
ABBREVIATED DIALING
ARRANGEMENTS.**

)
) **CC DOCKET NO. 92-105**
)
) **THAT 311 BE RESERVED**
) **FOR USE BY COMMUNITIES**
) **FOR NON-EMERGENCY**
) **POLICE TELEPHONE CALLS**

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**COMMENTS OF THE
TEXAS DEPARTMENT OF INFORMATION RESOURCES**

The Texas Department of Information Resources (DIR) provided comments in response to requests by federal agencies and others for the assignment of N11 Codes. DIR supports the position that the assignment of N11 codes should be preserved for use and allocation by government entities in providing access to information and services that serve the public interest.

The request by the Department of Justice to use 311 for non-emergency communications, includes the stipulation that a local jurisdiction could provide access to other government information and services. As this is non-emergency traffic, the system design should include electronic access to the same sources of information and services (e.g., locating the correct government agency/office that provides a specific service and in some cases filling out a required form/report). The key issue is that the citizen is seeking information or a service and does not care what level or branch of government is responsible. They should also have the option of accessing this information through voice or data communications.

Several government entities have proposed creating a database of information about federal, state and local government information and services. However, they have not considered providing public access to the same electronic database. Other government initiatives are working on electronic access to government information and services.

Currently, the State of Texas is working with several federal agencies and the Electronic Messaging Association (EMA) membership to demonstrate Directory Services, based on the international standards in the ISO X.500 series, that could facilitate public access initiatives to information and services, through voice or data communications. The same Directory services also provide the infrastructure that will support electronic commerce between government entities and the public.

A key issue not addressed in the Department of Justice proposal is how the 311 services would be funded. The Department of Justice has provided \$350,000 to the city of Baltimore for its two-year pilot project. AT&T is donating phone lines to the pilot and has invested over \$1 million in the program, according to the AP news sources.

The National Information Infrastructure (NII) initiative is currently focused on the concept that building the NII will be a partnership between the government and private industry. In April 1996, the Department submitted comments on the FCC Proposed Rulemaking and Order Establishing the Joint Board. One of the recommendations included an initiative for improving access to government information and services through the auction of two-three of the currently unassigned N11 numbers. Part of the auction price for the N11 numbers included the provision that the operators of the N11 service would provide access (voice and data) to government information and services. The provision of Directory services, that would index government information and services could be included in the auction price.

The Department of Justice request, with the stipulation that a local jurisdiction could provide access to other government information and services, has merit and should be supported. However, the FCC needs to consider several related issues before making a final determination on the use and assignment of N11 numbers:

1. The assignment and use of additional N11 numbers should in no way have an adverse impact on accessing or routing 911 emergency calls.
2. The assignment of an N11 number for access to government information or services must include all levels of government.
3. Access to the government information and services must include both voice and data access to the same information source. While technology could support data or voice access through the same number, assignment of different numbers (e.g., 211 for data and 311 for voice) might assist in assessing trends in usage.
4. The Directory Service standard X.500 technology should be evaluated as the common data structure for indexing government information and services.
5. As part of the evaluation of the X.500 technology for indexing government information and services, the FCC should assess this technology as a replacement for the current telephone directory services, and require all service providers to make listing information (White Pages) available. With passage and implementation of the new Telecommunications Act, many areas of the country will soon have multiple services providers, the X.500 technology could provide common access to directory information regardless of service provider.
6. In assessing the X.500 technology for providing access to non-emergency information and services, the FCC should also consider potential

government/industry partnerships for reducing the cost to provide these services. Should the addition of advertising (Yellow Pages) be allowed, providing it does not impede access to the government information and services.

SUMMARY

The Federal Communications Commission can ensure that N11 assignments are consistent nationwide by allocating the N11 numbers for public interest/access purposes. Access to non-emergency information and services should include a common Directory Service. The FCC should work with the other Federal agencies and the Electronic Messaging Association (EMA) in the evaluation and demonstration of Directory Services based on the X.500 specifications. That electronic access be provided by the same or additional N11 number. The FCC consider public/private partnerships in providing these services.